

GREENBERG TRAUIG, LLP
 Kurt A. Kappes, CA Bar No. 146384
kappesk@gtlaw.com
 Matthew L. Reagan, CA Bar No. 261832
reaganma@gtlaw.com
 1201 K Street, Suite 1100
 Sacramento, California 95814
 Telephone: (916) 442-1111
 Facsimile: (916) 448-1709

ANDERSON & KARRENBURG
 Thomas R. Karrenberg (*admitted pro hac vice*)
tkarrenberg@aklawfirm.com
 Heather M. Sneddon (*admitted pro hac vice*)
hsneddon@aklawfirm.com
 Samantha J. Slark (*admitted pro hac vice*)
sslark@aklawfirm.com
 50 West Broadway, Suite 700
 Salt Lake City, Utah 84101
 Telephone: (801) 534-1700
 Facsimile: (801) 364-7697

Attorneys for Defendant
 KARMA TECHNOLOGIES, LLC

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

BRADFORD TECHNOLOGIES, INC.,)	Case No. 3:11-CV-04621 (EDL)
)	
Plaintiff,)	PROPOSED ORDER GRANTING
)	STIPULATED REQUEST FOR
v.)	EXTENSION OF TIME FOR KARMA
)	TECHNOLOGIES, LLC TO FILE A
NCV SOFTWARE.com, an entity of unknown)	REPLY IN SUPPORT OF ITS MOTION
form; METRO NATIONAL FINANCIAL,)	TO DISMISS OR, IN THE
LLC, a Utah limited liability company,)	ALTERNATIVE, FOR MORE
KARMA TECHNOLOGIES, LLC, a Utah)	DEFINITE STATEMENT
limited liability company, JOHN DAVID)	
BIGGERS, an individual, RODNEY)	
NEWMAN, an individual, RICHARD PETER)	Date: December 13, 2011
STEVES, an individual, RICHARD FRANK,)	Time: 2:00 p.m.
an individual, and DOES 1-50,)	Dept./Place: Courtroom E – 15 th Floor
)	Judge: Magistrate Judge Elizabeth D. Laporte
Defendants.)	

Defendant Karma Technologies, LLC (“Karma”), by and through its undersigned counsel, hereby requests an extension of time to file a reply memorandum in support of its Motion to Dismiss or, in the Alternative, for More Definite Statement (the “Motion to Dismiss”).

1 The reply is currently due on Wednesday, November 23, 2011 (the day before Thanksgiving),
2 and Karma requests an extension until November 30, 2011.

3 As set forth in the Declaration of Heather M. Sneddon, filed concurrently herewith,
4 Karma requests the foregoing extension in light of the Thanksgiving holiday and the previously-
5 scheduled family vacations of its attorneys. Karma has not previously requested an extension of
6 time by stipulation or through Court order. In addition, because the hearing on Karma's Motion
7 to Dismiss is not scheduled until December 13, 2011, the filing of Karma's reply memorandum
8 by November 30, 2011 should not affect the schedule in this case. Finally, Plaintiff Bradford
9 Technologies, LLC, through its undersigned counsel, stipulates to Karma's requested extension.

10 Accordingly, Karma respectfully requests that it be granted an extension until November
11 30, 2011 to file a reply memorandum in support of its Motion to Dismiss.

12 Respectfully submitted,

13 DATED: November 22, 2011

GREENBERG TRAURIG, LLP

14 By: /s/ Matthew L. Reagan

15
16 - and -

17 ANDERSON & KARRENBURG
18 Thomas R. Karrenberg
Heather M. Sneddon
19 Samantha J. Slark

20 Attorneys for Defendant
KARMA TECHNOLOGIES, LLC

21 Stipulated:

22 DATED: November 22, 2011

THE HERITAGE LAW GROUP, P.C.

23 By: /s/ Roger D. Wintle

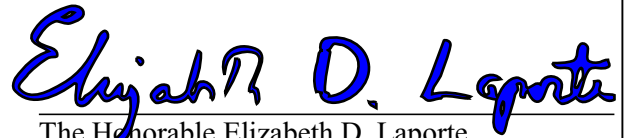
24 Attorneys for Plaintiff
25 BRADFORD TECHNOLOGIES, INC.
26
27
28

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: November 22, 2011

BY THE COURT:



The Honorable Elizabeth D. Laporte
U.S. District Court Magistrate Judge